

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
10805 Sunset Office Drive, Suite 100 St. Louis, MO 63127-1017
(314)822-0101
FAX (314)822-0943

March 8, 1995

Clyde Tendick, Technical Manager
Vanguard Plastics, Incorporated
1780 Belt Way Drive
St. Louis, MO 63114

Dear Mr. Tendick:

On January 16, 1995, a hazardous waste management inspection was conducted by Mr. Thomas Sims of my staff at Vanguard Plastics, Incorporated (Vanguard), at 1780 Belt Way Drive, St. Louis, Missouri 63114. This inspection was conducted under the authority of the Resource Conservation and Recovery Act of 1976 (RCRA) and Subsection 260.375(9) and Section 260.377 of the Missouri Hazardous Waste Management Law. This inspection was conducted in lieu of the inspection originally scheduled for R.S. Plastech, Incorporated, 10700 Kahlmeyer Drive, St. Louis, Missouri, whose operation was taken over by Vanguard and relocated to the above address.

The enclosed Inspection Record and Checklist was completed by Mr. Sims as a part of the inspection. Copies of the manifests, waste analyses, Material Data Safety Sheets, waste oil notification acknowledgement, deactivation requests, and facility correspondence obtained as a part of the inspection are also enclosed.

No response from Vanguard Plastics, Incorporated, is required resultant to the inspection at this time. If you have any questions concerning the inspection or hazardous waste management, you may contact Mr. Sims at this office.

Sincerely,

ST. LOUIS REGIONAL OFFICE



Robert S. P. Eck
Regional Director

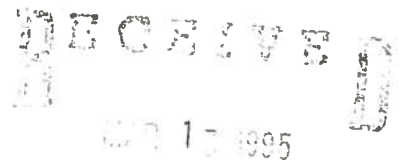
RSPE/TWS/jh

Enclosures

c: HWP



R00033444
RCRA Records Center





MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

S

SQG-INSP

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <i>Vanguard Plastics, Inc (Vanguard)</i>	DATE <i>2-28-95</i>	EPA I.D. NUMBER <i>NA</i>
ADDRESS <i>1780 Belt Way Dr.</i>	RR NO. <i>NA</i>	MO I.D. NUMBER <i>NA/A19339</i>
CITY <i>St. Louis, MO 63114</i>	NUMBER OF EMPLOYEES <i>est. 50</i>	TELEPHONE NUMBER <i>(314) 428-3020</i>
FACILITY REPRESENTATIVE(S), TITLE(S) <i>Mr. Clyde Tendick, Technical Manager; Mr. Gene Gird, Process Engineer</i>		

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

Vanguard is a producer of grocery and other plastic bags, of various coloring, at the above location. Prior to December, 1992, Vanguard was located at 10600 Kahlmeyer in St. Louis, MO 63132 and operated under EPA I.D. # MCD177863644 and MO I.D. # 010948 (#s now deactivated). On or about December, 1992, Vanguard acquired RS Plastech, Inc; formerly located at 10700 Kahlmeyer in St. Louis, MO 63132 and operated under EPA I.D. # MCD103226445 and MO I.D. # 010950 (#s now deactivated); and has included the operations at Vanguard's current location as a part of the takeover. Vanguard is currently being operated as a conditionally exempt small quantity generator of hazardous waste. Corollary of the takeover, RS Plastech, Inc no longer exists as an entity.

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1. Waste Combustible Liquid - petroleum naphtha from "Safety Kleen" parts washer - contains D006, D008, D018, D035, D039, and D040	~5 gal./mo.	D001	Safety Kleen & 4526 Towne & St. Charles, MO
2. Used Oil - gear and hydraulic oils from fluid changing of rolling equipment, etc.	~250 gal./yr.	D098	Solvent Recovery Co., 716 Maiberry Kansas City, MO
3. Waste Ink - non-hazardous - from process leftovers, and equipment washing to sanitary sewers	—	NA	—
4.			
5.			

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW <i>MSP</i> |
| <input type="checkbox"/> Septic Tank | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill |
| <input type="checkbox"/> Air Permit | <input type="checkbox"/> Precious Metal Reclamation | <input type="checkbox"/> Waste Water Pretreatment |

A. GENERAL

- | | |
|---|-----|
| 1. <input type="checkbox"/> Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A) | GGR |
| 2. <input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11 | GGR |
| 3. <input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo | GGR |
| 4. <input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo | GGR |
| 5. <input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo | GGR |

COMMENTS
registered for used oil only at present location.

PART 1: WALK-THROUGH INSPECTION**B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

- | | |
|--|-----|
| 1. <input type="checkbox"/> Storage does not exceed 180 days (270 days if transported > 200 miles) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e) | GSQ |
| 2. <input type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171 | GPT |
| 3. <input type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172 | GPT |
| 4. <input type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a) | GPT |
| 5. <input type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c) | GPT |
| 6. <input type="checkbox"/> Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262 (2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265 (2)(I)3. | GOR |
| 7. <input type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262 (2)(C)1. | GOR |
| 8. <input type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2) | GPT |
| 9. <input type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(II) | GOR |
| 10. <input type="checkbox"/> Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(I) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3) | GPT |
| 11. <input type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II) | GPT |
| 12. <input type="checkbox"/> Daily inspection of areas subject to spills, ie. waste handling areas | GOR |
| 13. <input type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35 | GPT |
| 14. <input type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33 | GPT |
| 15. <input type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II) | GOR |
| 16. <input checked="" type="checkbox"/> Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C) | GOR |

COMMENTS
No hazardous waste being stored at site

C. SATELLITE ACCUMULATION

- | | |
|---|-----|
| 1. <input type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173 | GPT |
| 2. <input type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171 | GPT |
| 3. <input type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172 | GPT |
| 4. <input type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1) | GPT |
| 5. <input type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)3. | GPT |
| 6. <input type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3. | GOR |

COMMENTS
No hazardous waste being accumulated

7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	COMMENTS		
D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES				
1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31	GPT	COMMENTS		
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34 (d)(4) referencing 40 CFR 265 Subpart C.	GPT			
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT			
4. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT			
5. <input checked="" type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
6. <input checked="" type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
7. <input checked="" type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
8. <input checked="" type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ			
9. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT			
10. <input checked="" type="checkbox"/> Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT			
E. SQG TANKS				
TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1. NA				
2.				
3.				
1. <input checked="" type="checkbox"/> Uncovered tanks have 2 ft. freeboard or containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3)	GPT	COMMENTS No hazardous waste storage tanks on site		
2. <input checked="" type="checkbox"/> Continuously fed tanks equipped with a feed cut-off system or a proper by-pass system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4)	GPT			
3. <input checked="" type="checkbox"/> Waste and/or treatment method is compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2)	GPT			
4. <input checked="" type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)	GPT			
5. <input checked="" type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1)	GPT			
6. <input checked="" type="checkbox"/> Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(2)	GPT			
7. <input checked="" type="checkbox"/> Volatiles with vapor pressure > 78 mm Hg @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(I)	GOR			
8. <input checked="" type="checkbox"/> Wastes and residues removed from tank and equipment, and handled properly upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d)	GPT			
9. <input checked="" type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT			

10. <input type="checkbox"/> Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)	GPT	COMMENTS
11. <input type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5	GPT	
12. <input type="checkbox"/> Waste oil tanks in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR	

PART 2: RECORDS INSPECTION

F. MANIFESTS

1. <input checked="" type="checkbox"/> Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380.1(6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR	COMMENTS used oil manifested "Safety Klean" parts washer solvent agreement
2. <input checked="" type="checkbox"/> Generator maintains a copy of the contractual agreement on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)	GMR	
3. <input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR	
4. <input checked="" type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR	
5. <input checked="" type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A	GOR	
6. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	GMR	
7. <input checked="" type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#'s - 10 CSR 25-5.262(2)(B)2.	GMR	
8. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1.	GMR	
9. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.	GMR	
10. <input checked="" type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR	
11. <input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	GMR	
12. <input type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A	GOR	
13. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1	GOR	
14. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C	GRR	
15. <input checked="" type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1	GOR	
16. <input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
17. <input checked="" type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
18. <input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	

G. PREPAREDNESS AND PREVENTION

1. <input type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	GPT	COMMENTS
2. <input type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)	GSQ	

H. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D)	GOR	COMMENTS
2. <input type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.	GOR	
3. <input checked="" type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input checked="" type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	

1. RESOURCE RECOVERY

1. <input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.	GOR
2. <input type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380.1(5) RSMo.	GOR
3. <input type="checkbox"/> Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).	GOR
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.	GOR
6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR
7. <input type="checkbox"/> Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR

COMMENTS

No resource recovery process present

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE

DATE

INSTRUCTIONS FOR THE COM-
PLETION OF THIS FORM ARE ON A
SEPARATE SHEET

THIS DOCUMENT MUST BE USED
FOR ALL MISSOURI-DESTINED
SHIPMENTS

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

HAZARDOUS WASTE MANIFEST



Please print or type (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No 2050-0039 Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No	Manifest Document No	2. Page of	Information in the shaded areas is required by State law	
3. Generator's Name and Mailing Address VanGuard Plastics 1780 Beltway Drive, Overland MO 63114-		6. US EPA ID Number KAD061672812		A. Missouri Manifest Document Number A19339		
4. Generator's Phone (314) 428-3020		8. US EPA ID Number		B. G.S.I. (Gen. Site Address) SAME		
5. Transporter 1 Company Name RESOURCE TRANSPORTATION CORPORATION		10. US EPA ID Number		C. MO. Trans. ID H-1091		
7. Transporter 2 Company Name		12. Containers		D. Transporter's Phone 816-474-1391		
9. Designated Facility Name and Site Address SOLVENT RECOVERY CORPORATION 716 MULBERRY KANSAS CITY, MO 64101		13. Total Quantity		E. MO. Trans. ID		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) a. State Regulated Waste Oil (EPA N/R)		14. Unit Wt/Vol		F. Transporter's Phone		
b.		1. Waste No.		G. State Facility's ID RR-019		
c.		EPA WASTE CODE		H. Facility's Phone 816-474-1391		
d.		STATE				
J. Additional Descriptions for Materials Listed Above		K. HANDLING CODE (FACILITY USE ONLY)				
a. D098 SG = .8 #004881		INTERIM		COMMENTS		
b.		FINAL				
c.						
d.						
15. Special Handling Instructions and Additional Information RETURN WASTE TO GENERATOR IF UNDELIVERABLE. EMERGENCY CONTACT: 314 428-3020						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name Forest L Sharp		Signature Forest L Sharp		Date 04/10/93		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name		Signature		Date		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Ann Zimmer		Signature Ann Zimmer		Date 04/10/93		



BURLINGTON ENVIRONMENTAL

ANNUAL WASTE PROFILE RECERTIFICATION

Date: 6-4-93

Solvent Recovery Corporation dba
Burlington Environmental, Inc.
Post Office Box 012035
Kansas City, Missouri 64101-0035

Profile Number

4881

Waste Name

Waste Oil (Clean & Lube)

I, the Generator of the referenced waste stream, hereby certify that the waste stream and corresponding Waste Stream Profile remain the same as presently approved by Solvent Recovery Corporation dba Burlington Environmental, Inc. (BEI). All EPA waste codes, as applied to this waste, remain accurate and there has been no change to:

1. The process for operation generating this hazardous waste;
2. The physical and chemical properties of the waste material as profiled; and
3. The status of this waste in accordance with any Land Ban promulgated in CFR 40 Part 268.

D. Van Nortwick

Signature of Responsible Party

6/4/93

Date

PLANT ENGINEER

Title

Full Name, Address & Telephone
Number of Generator:

VANGUARD PLASTICS, INC
1780 BELTWAY DR.
ST. LOUIS, MO. 63114

Burlington Environmental Inc.
801 Mulberry
Kansas City, MO 64101
EPA NO. MOD000610766
Missouri No. 01764

Analysis Date: 04/11/91
Recertification: / /
Approval Number: 004881
TCLP RAN: / /

WASTE PROFILE

Name of Waste: WASTE OIL (GEAR & LUBE)
Process Generating Waste: Equipment Maintenance
EPA-Federal Waste ID Nos: D098
Salon: RSM

Generator EPA No. MOD177863544 Gen Name: Vanguard Plastics
Generator MO No. 010948 Address: 10500 Kahlmeyer Drive
MO Waste Stream ID No.: St. Louis, MO 63132-
Don Van Nortwick
314-428-3020

Hazard Codes

Health: 1
Flammable: 1
Reactivity: 0
Other:

WASTE CHEMICAL COMPOSITION

MS & Volatile HC 100

Treatment Code M051

METALS EP TOX UNITS

Arsenic	N.P.	mg/l
Barium	N.P.	mg/l
Cadmium	N.P.	mg/l
Chromium	N.P.	mg/l
Lead	N.P.	mg/l
Mercury	N.P.	mg/l
Selenium	N.P.	mg/l
Silver	N.P.	mg/l
Copper	N.T.	mg/l
Nickel	N.T.	mg/l
Zinc	N.T.	mg/l
Antimony	N.T.	mg/l
Strontium	N.T.	mg/l
Cyanides	N.T.	mg/l
Sulfides	N.T.	mg/l
Phenolics	N.T.	mg/l
PCBs	N.T.	mg/l
Chromium-6	N.T.	mg/l
Chlorides	0-2	%
Ash Content	N.F.	%

PHYSICAL CHARACTERISTICS

Layers	Single
Physical State	Liquid
Solubility	Xylene, Toluene
BTUs	16329 - 22329
Color	Dark Green
Flash Point	>200
PH	5.0-6.0
Specific Gravity	0.8520
Viscosity	Low-Medium
Solids %	1

METALS LETTER: 04/05/91
VOA/VOC ANALYSIS: / /

DOT Shipping Name: State Regulated Waste Oil
Hazard Class: N/A UN/NA ID#: N/A
Package Group: RQ: N/A Lbs. ER#: NA Placard None
Constituents:
Labels: None

SPECIAL HANDLING INFORMATION:

SOME OF THESE MATERIALS MAY BURN BUT DO NOT IGNITE READILY.
LITTLE IMMEDIATE HEALTH HAZARD

Generator Certification: Don Van Nortwick Title: PLANT ENGINEER Date: 6/4/93

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2000-0006, pages 2-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's USEPA ID No.	Manifest Document No.	2. Page of	Information on this manifest is required by 19 CFR 171.15
3. Generator's Name and Mailing Address			A. Missouri Manifest Document Number		
4. Generator's Phone ()			B. Generator's Site Address		
5. Transporter 1 Company Name			C. EPA ID Number		
6. Transporter 1 Phone			D. Transporter's Name		
7. Transporter 2 Company Name			E. EPA ID Number		
8. Transporter 2 Phone			F. Transporter's Name		
9. Designated Facility Name and Site Address			G. State Facility's ID		
10. Facility's Phone			H. Facility's Name		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers	13. Total Quantity	14. Waste No.
			Number	Type	Wt/Vol
a.					
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above			K. HANDLING CODE (FACILITY USE ONLY)		
			INTERIM FINAL		
a.			a.		
b.			b.		
c.			c.		
d.			d.		
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.					
Printed/Typed Name			Signature		Month Day Year
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature		Month Day Year
Printed/Typed Name			Signature		Month Day Year
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Month Day Year
Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space					
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19					Month Day Year
Printed/Typed Name					Signature

Solvent Recovery Corporation
716 Mulberry
Kansas City, MO 64101
EPA NO. MOD000610766
Missouri No. 01764

Analysis Date: 04/11/91
Recertification: / /
Approval Number: 004881
TCLP RAN: / /

WASTE PROFILE

Name of Waste: WASTE OIL (GEAR & LUBE)
Process Generating Waste: Equipment Maintenance
EPA-Federal Waste ID Nos: D098
Sales: RSM

Generator EPA No.: MOD177863644 Gen Name: VanGuard Plastics
Generator MO No.: 010948 Address: 10600 Kahlmeyer Drive
MO Waste Stream ID No.: St. Louis, MO 63132-
Don Van Nortwick
314-428-3020

Hazard Codes

Health: 1
Flammable: 1
Reactivity: 0
Other:

WASTE CHEMICAL COMPOSITION %
MS & Volatile HC ~100

Treatment Code M051

METALS EP TOX UNITS

Arsenic	N.P.	mg/l
Barium	N.P.	mg/l
Cadmium	N.P.	mg/l
Chromium	N.P.	mg/l
Lead	N.P.	mg/l
Mercury	N.P.	mg/l
Selenium	N.P.	mg/l
Silver	N.P.	mg/l
Copper	N.T.	mg/l
Nickel	N.T.	mg/l
Zinc	N.T.	mg/l
Antimony	N.T.	mg/l
Strontium	N.T.	mg/l
Cyanides	N.T.	mg/l
Sulfides	N.T.	mg/l
Phenolics	N.T.	mg/l
PCBs	N.T.	mg/l
Chromium-6	N.T.	mg/l

PHYSICAL CHARACTERISTICS

Layers	Single
Physical State	Liquid
Solubility	Xylene, Toluene
BTUs	16329 - 22329
Color	Dark Green
Flash Point	>200
PH	5.0-6.0
Specific Gravity	0.8520
Viscosity	Low-Medium
Solids %	1

Chlorides 0-3 %
Ash Content N.T. %
METALS LETTER: 04/05/91
VOA/VOC ANALYSIS: / /

PERSONAL PROTECTION EQUIPMENT

RESPIRATOR	CLOTHING
Air Supply	Regular
Combo Resp	Polycoat
Reg Resp	Saranex

SHIPPING INFORMATION

24 HOUR RESPONSE:
Name: State Regulated Waste Oil
Hazard Class: N/A
Constituents:
DOT Labels: None
Placards: None
RQ: N/A Lbs. ER# NA

SPECIAL HANDLING INFORMATION:

SOME OF THESE MATERIALS MAY BURN BUT DO NOT IGNITE READILY.
LITTLE IMMEDIATE HEALTH HAZARD

Generator

Certification

Don Van Nortwick

Title:

TECHNICAL MANAGER

Date:

4/1/92

CUSTOMER NAME 339-2 VANGUARD PLASTICS						JOB ORDER NO.		SCHEDULED SERVICE WEEK 34-50		SCHEDULED SERVICE TERRITORY 1-1	
SERVICE DESCRIPTION J-00952 MACH SVCP						QUANTITY 103.57		VICE DATE 12-13-94		MANIFEST NUMBER XXXX	
PAID ACCT DIST 42801								VICE NUMBER 517619			
								SALES TAX INCLUDED 6.07			
								PAY THIS AMOUNT BY 12-30-94			
						103.57		PREVIOUS BALANCE		PORTION OVER 60 DAYS	
								SERVICE TAX .06225		C.O.M.S. TAX .06225	
								PRODUCT TAX			
SERVICE NO.	SERIAL NO.	SERVICE CHARGE	SALES TAX	TOTAL CHARGE	SOLVENT CLEAN	SPEECH	SERVICE TERM	CHANGE SERVICE TERM (WEEKS)	CHANGE SCHEDULED DATE (YY MM DD)	INV. CODE	REMARKS
175-00952		97.50	6.07	103.57	XX	XX	03				
TOTAL SERVICE SECTION		97.50	6.07	103.57	MACHINE CONDITION & CLEANLINESS		GOOD POOR	DECALS IN PLACE AND LEGIBLE		YES NO	MACHINE PROPERLY GROUNDED
					LAMP ASSEMBLY CONDITION		GOOD POOR	EQUIPMENT INSTALLED		YES NO	LOCAL PHONE NO. STICKER ATTACHED TO MACHINE
								EMERGENCY CLOSING OF LID UNOBTAINED		YES NO	SPENT SOLVENT MEETS ACCEPTANCE CRITERIA
USEPA TRANSPORTER ID NO.		MO0095486312		GENERATOR USEPA ID NO.		STATE ID NO.					
11. US DOT DESCRIPTION - (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)					12. CONTAINERS NO.	TYPE	13. TOTAL QUANTITY	14. UNIT WT/VOL	SK. DOT NUMBER	CONTAINER SIZE	I CERTIFY THAT MY TOTAL WASTE STREAMS ARE WITHIN ONE OF THE FOLLOWING CATEGORIES:
WASTE COMBUSTIBLE LIQUID, N.O.S. 5G.B (PETROLEUM NAPHTHA) NA1993 PGIII(0001) (DO06, DO08, DO18, DO35, DO39, DO40) (ERG#21)					1	DM	7				0 TO 220 LBS./MONTH INITIALS
											220 LBS. TO 2,200 LBS./MONTH INITIALS
											GREATER THAN 2,200 LBS./MONTH INITIALS
DESIGNATED FACILITY NAME AND ADDRESS					SAFETY-PL. N CORP. ST CHARLES, MO 63314			USA EPA ID NO.		STATE ID NO.	
4526 TOWNE COURT											
PRODUCT SALES SECTION											
PRODUCT NUMBER	DESCRIPTION	MSDS GIVEN	PRICE	UM	QUANTITY DELIVERED	S O	TAX	LINE TOTAL			
CASH	TOTAL RECEIVED	APPLY PAYMENT TO:		TOTAL PRODUCTS AMOUNT				TOTAL SERVICE AMOUNT (FROM ABOVE)			
CHECK NUMBER		TODAY'S SERVICE/SALE						TOTAL DUE			
INV. #	AMOUNT \$	PREVIOUS BALANCE AS FOLLOWS						103.57			
PREVIOUS CREDIT CARD NO.				CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. THE RECLAMATION AGREEMENT, ADDITIONAL TERMS AND CONDITIONS, AND OTHER INFORMATION APPEARING ON THE REVERSE SIDE ARE MADE A PART HEREOF.				103.57			
CREDIT CARD NO.				This is to certify that the above-named materials are properly classified, described, packaged, marked and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.							
CONSUMER REFERENCE INFORMATION				Print Name Pamela Russell x Pamela Russell							
IN THE EVENT OF AN EMERGENCY CALL 1-800-888-8880 (24 hours)											
SEE REVERSE SIDE FOR IMPORTANT INFORMATION											



HAZARD RATINGS

Minimal -----0
Slight -----1
Moderate-----2
Serious-----3
Severe-----4

Health-----1
Flammability----1
Reactivity-----0

MATERIAL SAFETY DATA SHEET

Information on this form is proprietary information
and furnished solely for the use of our customers.

SECTION I GENERAL INFORMATION

MANUFACTURER

Flint Ink Corporation
33105 Schoolcraft Road
Livonia, MI 48150

24 HR. MEDICAL EMERGENCY NUMBERS

1-800-228-5635
221-3999 (TWIN CITIES ONLY)

TECHNICAL INFORMATION

1-800-SEND INK

MSDS INFORMATION

1-313-458-7500
Preparation Date: 7/15/92

APPLICABLE PRODUCTS:

Poly Aqua Gloss Red RTR-19041
186

PRODUCT IDENTIFICATION:

TYPE: Water Flexographic
CLASS: "A"
System: General

SECTION II HAZARDOUS INGREDIENTS

Regulated Substance:

Proprietary Diluent
Pigments and/or other Dry Materials
(Nuisance Dust)

8 Hr. EXPOSURE LIMIT

OSHA PEL

3 ppm

15 mg/M³

ACGIH TLV

3 ppm

10 mg/M³

SECTION III

PHYSICAL PROPERTIES

Boiling Point: 167-400° F

Appearance & Qdor: Colored Liquid
W/Ammoniacal Odor

Vapor Pressure: >10mm Hg

Specific Gravity: > 1.0

Vapor Density: >.0

Melting Point: N/A

Solubility In Water: Complete

Evaporation Rate: > 1.0
(vs butyl acetate)

SECTION IV

FIRE AND EXPLOSION HAZARD INFORMATION

LOWEST FLASH POINT: 163° F PMCC FLAMMABLE LIMITS (LEL): 2.0

EXTINGUISHING MEDIA: Foam, Carbon Dioxide, Or Dry Chemical

SPECIAL FIRE FIGHTING PROCEDURES: Use Water Fog To Cool Containers
Use Self Contained breathing
Apparatus where Appropriate to
Fight Fire.

SECTION IV

FIRE AND EXPLOSION HAZARD INFORMATION CONT'D

Special Fire Fighting Procedures: Wear protective clothing, fight fire from safe distance.

Unusual Fire and Explosion Hazards: None known.

SECTION V

REACTIVITY DATA

Stability: Unstable _____
Stable X

Materials to Avoid: Strong oxidizing agents, strong acids

Conditions to Avoid: Extreme heat or open flames or sparks

Decomposition by products: Acrid Smoke
Oxides of Carbon (carbon monoxide, carbon dioxide)
Oxides of Nitrogen (nitrogen dioxide)

Polymerization Reactions: May Occur _____
Will Not Occur X

SECTION VI

HEALTH HAZARD DATA

Routes Of Entry: Ingestion may be possible if materials are not thoroughly removed from hands prior to eating. Vapors at room temperature may be breathed, and exposure may occur in the lungs.

Acute and Chronic Health Effects: Liquid material in contact with eyes will cause irritation. Vapors may irritate eyes, inhalation can cause respiratory tract irritation.

• Carcinogenicity:	<u>NTP</u>	<u>IARC Monograph</u>	<u>OSHA Regulated</u>
	No	No	No

• Refers to components

SECTION VI

HEALTH HAZARD DATA CONT'D.

Nuisance Dust: Nuisance dust refers to particulates which have not demonstrated specific toxic effects or damage to the lungs when breathed. Excessive concentrations of nuisance dusts in the workroom air may seriously reduce visibility, may cause unpleasant deposits in the nasal passages, eyes and ears or cause injury to the skin due to the constant cleansing necessary for their removal. Again, nuisance dusts in this case refers to the ink or coating when dry.

Signs and Symptoms of Over Exposure: If inhaled, causes headache, drowsiness, nausea, and vomiting. If swallowed, causes drunkenness, followed by severe systemic illness.

Medical Conditions to Avoid: At present, information is not know to manufacturer.

Emergency and First Aid: Skin: Wash skin with soap and water. If clothes become soaked, remove immediately.
Eyes: Flush eyes with water for 15 minutes.
Ingestion: SEEK medical attention, do not induce vomiting. Call 24 hr. emergency phone number on page 1 for treatment information.

SECTION VII

SAFE HANDLING PRACTICES

Spill Procedure: Absorb or contain with sand or an absorbent material, and dispose in approved manner. Wear appropriate protective equipment which may include chemical resistant gloves, goggles or face shield, apron, respiratory protection (see Section VIII below).

Waste Disposal: Dispose in accordance with Federal, state, or local regulations. Material may be compatible with industrial waste incineration or inclusion in a fuel-blending program. This characterization is subject to approval by your waste management contractor.

Handling and Storage: Protect container from freezing. Overheating may cause container to rupture, thus covered storage is preferable. Containers should not be stacked more than two high. 55 gallon containers should be moved with appropriate material ~~handling equipment~~.

SECTION VIII

CONTROL MEASURES

Respiratory Protection: If necessary, a MSHA/NIOSH approved respirator capable of removing organic vapors (black or yellow cartridge, per Table I-1 29 CFR 1910.134) should be used to protect workers. Typically, a negative pressure demand respirator (half-mask or full-face) will suffice in routine operations*, however, they are not intended where the Maximum Use Concentration (MUC) is exceeded for a particular cartridge-mask combination. Consult with your safety equipment supplier.

- * The Employer is responsible for selecting the correct means of respiratory protection, and assuring the respirator fits properly. A properly fit respirator can only be determined by performing a respirator fit-test (29 CFR 1910.134). Studies have shown that a proper seal cannot be guaranteed if there is facial hair between the respirator face-piece and the wearer's face.

Eye Protection: Splashproof safety goggles

Skin Protection: Chemical resistant gloves (Burl, neoprene, PVC).

Protection Clothing: Typically, usual work clothes will suffice.

Ventilation: Provide adequate exhaust ventilation at the point of generation to maintain the employees' breathing zone air below the exposure limit listed in Section II.

SECTION IX

SARA TITLE III, SECTION 313*

Compound NameCAS #% by Weight

SEE ATTACHED SHEET FOR SARA TITLE III, SECTION 313

- * Compounds listed in this section have been listed by the U.S. EPA under Section 313, The Toxic Chemical Release Inventory.

DISCLAIMER

Every reasonable effort has been made to ensure that the safety information on this sheet is accurate. But because Flint Ink has no control over the conditions under which the product will be used, liability is limited exclusively to replacement or refund of the purchase price of this product. Except as stated herein, there are no expressed or implied warranties, including implied warranties of merchantability or fitness for a particular purpose. Flint Ink assumes no liability for injury or incidental or consequential damages arising out of the storage, handling, or use of this product.

FINE INK CORPORATION

15-Jul-92

SARA Title III, Section 313
CONFIDENTIAL

ITEM ...

Poly Aqua Gloss Red RTR-19041

*** PHYSICAL DATA ***

SPECIFIC GRAVITY 1.073

PERCENT SOLIDS

BY WEIGHT

BY VOLUME

47.7%

43.9%

PERCENT WATER

51.4%

55.2%

PERCENT AMMONIA

0.3%

1.0%

PERCENT VOC

VOC PER GALLON OF INK LBS

VOC DENSITY

*** SARA Title III, Section 313 ***

ITEM

AMOUNT

CAS NO.

TLV

PEL

ELEMENTAL ZINC

0.169%

7440-66-6



HAZARD RATINGS
Minimal -----0
Slight -----1
Moderate -----2
Serious -----3
Severe -----4

Health-----1
Flammability-----1
Reactivity-----0

MATERIAL SAFETY DATA SHEET

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SECTION I GENERAL INFORMATION

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Flint Ink Corporation
33105 Schoolcraft Road
Livonia, MI 48150

24 HR. MEDICAL EMERGENCY NUMBERS

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221-3999 (TWIN CITIES ONLY)

TECHNICAL INFORMATION

1-800-SEND INK

MSDS INFORMATION

1-313-458-7500
Preparation Date: 7/15/92

APPLICABLE PRODUCTS:

Poly Aqua Pantone Yellow
RTY-1133

PRODUCT IDENTIFICATION:

TYPE: Water Flexographic
CLASS: "A"
System: General

SECTION II

HAZARDOUS INGREDIENTS

Regulated Substance:

8 Hr. EXPOSURE LIMIT

Proprietary Diluent
Pigments and/or other Dry Materials
(Nuisance Dust)

OSHA PEL

3 ppm
15 mg/M³

ACGIH. TLV

3 ppm
10 mg/M³

SECTION III

PHYSICAL PROPERTIES

Boiling Point: 167-400° F

Appearance & Odor: Colored Liquid
- W/Ammoniacal Odor

Vapor Pressure: >10mm Hg

Specific Gravity: > 1.0

Vapor Density: >.0

Melting Point: N/A

Solubility In Water: Complete

Evaporation Rate: > 1.0
(vs butyl acetate)

SECTION IV

FIRE AND EXPLOSION HAZARD INFORMATION

LOWEST FLASH POINT: 163° F PMCC FLAMMABLE LIMITS (LEL): 2.0

EXTINGUISHING MEDIA: Foam, Carbon Dioxide, Or Dry Chemical

SPECIAL FIRE FIGHTING PROCEDURES: Use Water Fog To Cool Containers
Use Self Contained breathing
Apparatus where Appropriate to
Fight Fire.

SECTION IV

FIRE AND EXPLOSION HAZARD INFORMATION CONT'D

Special Fire Fighting Procedures: Wear protective clothing, fight fire from safe distance.

Unusual Fire and Explosion Hazards: None known.

SECTION V

REACTIVITY DATA

Stability: Unstable _____
Stable X

Materials to Avoid: Strong oxidizing agents, strong acids

Conditions to Avoid: Extreme heat or open flames or sparks

Decomposition by products: Acid Smoke
Oxides of Carbon (carbon monoxide, carbon dioxide)
Oxides of Nitrogen (nitrogen dioxide)

Polymerization Reactions: May Occur _____
Will Not Occur X

SECTION VI

HEALTH HAZARD DATA

Routes Of Entry: Ingestion may be possible if materials are not thoroughly removed from hands prior to eating.
Vapors at room temperature may be breathed, and exposure may occur in the lungs.

Acute and Chronic Health Effects: Liquid material in contact with eyes will cause irritation. Vapors may irritate eyes, inhalation can cause respiratory tract irritation.

• Carcinogenicity:	<u>NTP</u>	<u>IARC Monograph</u>	<u>OSHA Regulated</u>
	No	No	No

• Refers to components

SECTION VI

HEALTH HAZARD DATA CONT'D.

Nuisance Dust:

Nuisance dust refers to particulates which have not demonstrated specific toxic effects or damage to the lungs when breathed. Excessive concentrations of nuisance dusts in the workroom air may seriously reduce visibility, may cause unpleasant deposits in the nasal passages, eyes and ears or cause injury to the skin due to the constant cleansing necessary for their removal. Again, nuisance dusts in this case refers to the ink or coating when dry.

Signs and Symptoms of Over Exposure: If inhaled, causes headache, drowsiness, nausea, and vomiting. If swallowed, causes drunkenness, followed by severe systemic illness.

Medical Conditions to Avoid:

At present, information is not know to manufacturer.

Emergency and First Aid:

Skin: Wash skin with soap and water. If clothes become soaked, remove immediately.

Eyes: Flush eyes with water for 15 minutes.

Ingestion: SEEK medical attention, do not induce vomiting. Call 24 hr. emergency phone number on page 1 for treatment information.

SECTION VII

SAFE HANDLING PRACTICES

Spill Procedure:

Absorb or contain with sand or an absorbent material, and dispose in approved manner. Wear appropriate protective equipment which may include chemical resistant gloves, goggles or face shield, apron, respiratory protection (see Section VIII below).

Waste Disposal:

Dispose in accordance with Federal, state, or local regulations. Material may be compatible with industrial waste incineration or inclusion in a fuel-blending program. This characterization is subject to approval by your waste management contractor.

Handling and Storage:

Protect container from freezing. Overheating may cause container to rupture, thus covered storage is preferable. Containers should not be stacked more than two high. 55 gallon containers should be moved with appropriate material handling equipment.

SECTION VIII

CONTROL MEASURES

Respiratory Protection: If necessary, a MSHA/NIOSH approved respirator capable of removing organic vapors (black or yellow cartridge, per Table I-1 29 CFR 1910.134) should be used to protect workers. Typically, a negative pressure demand respirator (half-mask or full-face) will suffice in routine operations*, however, they are not intended where the Maximum Use Concentration (MUC) is exceeded for a particular cartridge-mask combination. Consult with your safety equipment supplier.

- * The Employer is responsible for selecting the correct means of respiratory protection, and assuring the respirator fits properly. A properly fit respirator can only be determined by performing a respirator fit-test (29 CFR 1910.134). Studies have shown that a proper seal cannot be guaranteed if there is facial hair between the respirator face-piece and the wearer's face.

Eye Protection: Splashproof safety goggles

Skin Protection: Chemical resistant gloves (Butyl, neoprene, PVC).

Protection Clothing: Typically, usual work clothes will suffice.

Ventilation: Provide adequate exhaust ventilation at the point of generation to maintain the employees' breathing zone air below the exposure limit listed in Section II.

SECTION IX

SARA TITLE III, SECTION 313*

Compound NameCAS #% by Weight

SEE ATTACHED SHEET FOR SARA TITLE III, SECTION 313

- * Compounds listed in this section have been listed by the U.S. EPA under Section 313, The Toxic Chemical Release Inventory.

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FLINT INK CORPORATION

15-Jul-92

SARA Title III, Section 313
CONFIDENTIAL

ITEM ...
Poly Aqua Pantone Yellow RTY-1133

*** PHYSICAL DATA ***

SPECIFIC GRAVITY	1.067	BY WEIGHT	BY VOLUME
PERCENT SOLIDS		46.1%	42.6%
PERCENT WATER		52.9%	56.5%
PERCENT AMMONIA		0.9%	1.0%
PERCENT VOC			

VOC PER GALLON OF INK LBS
VOC DENSITY

*** SARA Title III, Section 313 ***

ITEM	AMOUNT	CAS NO.	TLV	PEL
ELEMENTAL ZINC	0.136%	7440-66-6	---	---

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

McL Canham, Governor • David A. Shott, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

JUNE 21, 1993

DON VAN NORTWICK
VANGUARD PLASTICS INC.
1780 BELTWAY DR.
ST. LOUIS, MO 63114

Re: Acknowledgment of ID Number for Waste Oil Generator Activity

Dear Waste Oil Generator:

This is to acknowledge that you have filed a waste oil generator form for an installation located at the address shown below. Your registration is in compliance with 10 CSR 25-11 of the Missouri Hazardous Waste Management Rules.

The identification number shown below must be included on all manifest documents used to transport waste oil. It must also be used on all reports that you file with the State of Missouri.

Please note that this ID number is for waste oil only. If you use approximately 27 gallons of paint thinner, degreaser, parts cleaner or other solvent within a month, then you must also register these wastes. This includes products leased from a service which both supplies and then removes the used products. To register these additional wastes, please call (314) 751-3176 and request a copy of form EPA 8700-12/MoDNR.

Installation Name....VANGUARD PLASTICS INC.

Site Address.....1780 BELTWAY DR.
ST. LOUIS, MO 63114

Missouri Generator
ID Number.....A19339

Sincerely,

HAZARDOUS WASTE PROGRAM

K. Purvis

Kenneth Purvis, Jr.
Environmental Specialist
Budget & Planning Section

KP:lh





VANGUARD PLASTICS INC.

1780 Beltway Drive
St. Louis, Missouri 63114
Tel. 314 - 428-3020

FACSIMILE

DATE 6/4/93

TIME 1 P.M.

PAGES 2

TO: MR. KENNETH PERUIS

FROM: DON VANBORTWICK

MESSAGE: FOLLOWING IS A FILLED OUT WASTE OIL REGISTRATION FORM
GIVEN TO ME BY BURLINGTON ENVIRONMENTAL. WE MOVED FROM OUR
PREVIOUS FACILITY AT 10600 KATLMAYER DR. - ST. LOUIS MO 63032
IN DECEMBER, 1992. ALSO, WE ACQUIRED R.S. PLASTECH AT ABOUT
THE SAME TIME. THEIR FORMER ADDRESS WAS 10700 KATLMAYER DR.
ST. LOUIS MO 63032.

SHOULDN'T WE HAVE THE R.S. PLASTECH GENERATOR NUMBERS
RETIRED? THEY ARE: MO# 010950 & EPA# MOD103226445.

I AM HOPING TO HAVE SOME WASTE OIL PICKED UP SOON. COULD
YOU EITHER FAX OR CALL ME WITH NEW/REISSUED GENERATOR
NUMBERS FOR VANGUARD PLASTICS SOON? VANGUARD'S EPA# IS
MOD177863644.

IN ADVANCE, THANK YOU.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
WASTE MANAGEMENT PROGRAM
FORM D.N.R. - H.W.G. - 5 GENERATOR OF
WASTE OIL REGISTRATION FORM

P.O. BOX 176
JEFFERSON CITY, MISSOURI 65102
314-751-3176

FOR OFFICE USE ONLY

INSTRUCTIONS		PRINT IN BLACK INK OR TYPE		GENERATOR ID NO.	
1. BUSINESS NAME VANGUARD PLASTICS, INC.					
2. MAILING ADDRESS (STREET OR P.O. BOX NO.) 1780 BELT WAY DR.					
CITY ST. LOUIS		STATE MO		ZIP CODE 63114	
3. SITE ADDRESS (DO NOT ENTER A P.O. BOX NO.) SAME AS ABOVE					
CITY		STATE		ZIP CODE	
4. CONTACT PERSON'S NAME DON VAN NORTWICK				TELEPHONE NUMBER 314-428-3020	
5. ESTIMATED AMOUNT OF WASTE OIL GENERATED PER MONTH 15 GALLONS					
6. NAME AND MAILING ADDRESS OF TRANSPORTATION FIRMS TRANSPORTING WASTE OIL FROM YOUR PREMISES					
A. NAME RESOURCE TRANSPORTATION CORP.					
ADDRESS (STREET OR P.O. BOX NO.) 801 MULBERRY					
CITY KANSAS CITY		STATE MO		ZIP CODE 64101	
B. NAME					
ADDRESS (STREET OR P.O. BOX NO.)					
CITY		STATE		ZIP CODE	
C. NAME					
ADDRESS (STREET OR P.O. BOX NO.)					
CITY		STATE		ZIP CODE	
D. NAME					
ADDRESS (STREET OR P.O. BOX NO.)					
CITY		STATE		ZIP CODE	
7. BRIEFLY DESCRIBE THE PROCESS(ES) WHICH GENERATES THE WASTE OIL GEAR OIL & HYDRAULIC OIL					
8. IF YOU ALREADY HAVE A MISSOURI GENERATOR IDENTIFICATION NUMBER FROM THE MISSOURI DEPARTMENT OF NATURAL RESOURCES PLEASE RECORD IT HERE 010948					
9. I HEREBY CERTIFY THAT THE INFORMATION PROVIDED HEREIN IS COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE					
SIGNATURE OF GENERATOR OR EMPLOYEE AUTHORIZED BY GENERATOR D.H. Van Nortwick				DATE 6/4/83	
				PRINT OR TYPE NAME D.H. VAN NORTWICK	

Environmental Engineering and Waste Management
RIEDEL INDUSTRIAL WASTE MANAGEMENT, INC.
A Subsidiary of Riedel Environmental Technologies, Inc.



"Imagining A Cleaner World"

CERTIFICATE OF DESTRUCTION

R S PLASTECH
ATTN: JOHN BRAFF
10700 KAHLMEYER DRIVE
ST. LOUIS, MISSOURI 63132

SOLVENT RECOVERY CORPORATION HEREBY CERTIFIES THAT ON OR BEFORE MARCH 18, 1991, ALL MATERIAL RECEIVED FROM R S PLASTECH, DESCRIBED ON MANIFEST NUMBER 010950-0002 DATED 02/27/91, WAS DISPOSED OF IN COMPLIANCE WITH ALL FEDERAL LAWS AND REGULATIONS.

TO ASSIST IN PREPARATION OF GENERATOR HAZARDOUS WASTE REPORTS, THE TREATMENT METHOD UTILIZED TO DISPOSE OF WASTE WILL BE MARKED WITH AN (X) NEXT TO APPROPRIATE DISPOSAL METHOD.

CODE FOR QUARTERLY

<u> X </u>	FUEL BLEND	(T04)
<u> </u>	SOLID FUEL	(T04)
<u> </u>	INCINERATION	(T03)
<u> </u>	LANDFILL	(D80)
<u> </u>	DEEPWELL INJECTION	(D79)
<u> </u>	OTHERS _____	

RIEDEL ENVIRONMENTAL SERVICES - SOLVENT RECOVERY DIVISION

BY

Rebecca K. Cansler

NAME

Rebecca K. Cansler

TITLE

Office Assistant

DATE

April 24, 1991

Riedel Industrial Waste Management, Inc.
22 North Euclid
St. Louis, MO 63108
(314) 361-3838
FAX (314) 361-4545

Lafser & Schrelber, Inc.
22 North Euclid
St. Louis, MO 63108
(314) 361-3838
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Solvent Recovery Corp.
801 Mulberry
Kansas City, MO 64101
(816) 474-1391
FAX (816) 474-1275

Resource Recovery, Inc.
P.O. Box 902
Hannibal, MO 63401
(314) 248-0730

Riedel Energy, Inc.
P.O. Box 314
Rt. 1, HWY 154
Perry, MO 63462
(314) 565-3232



March 10. 1993

Mr. Donald H. Van Nortwick
Vanguard Plastics. Inc.
1780 Beltway
St. Louis, Missouri 63114

Re: Poly Aqua Inks
Heavy Metals - U.S.D.A. - F.D.A. Status

Dear Don:

I have reviewed all formulations for Poly Aqua Printing inks produced by Flint Ink Corporation, Dallas, Texas, Jacksonville, Florida, and St. Louis, Missouri for heavy metal content.

This letter is to up date the status of our Poly Aqua printing inks regarding heavy metal content and U.S.D.A and F.D.A. regulations.

Heavy Metals:

None of our Poly Aqua printing inks are intentionally formulated with the known toxic heavy metals. ie; cadmium, barium, arsenic, mercury, antimony, lead, selenium, silver, or chromium.

Please keep in mind, however, that there is always a possibility of trace contamination of individual batches of ink which is beyond our control. For any manufacturer of printing inks to certify 100% absence of any heavy metals, analytical testing would be required to determine heavy metal content of each individual batch of ink. As this would significantly add to the cost of our products to you, we do not regularly perform these test.

I would be very wary of any supplier that guaranteed totally heavy metal free inks. It is virtually impossible to achieve the elimination of trace amounts of heavy metals in commonly used pigments.

U.S.D.A - F.D.A. Status:

First of all, concerning USDA and FDA "approval", there really is no such thing in regards to printing inks and their internal formulation for raw materials used. The USDA and FDA has a list of materials that are "generally regarded as safe" (GRAS LIST). If the ingredients that form the dry film of the ink are listed, or the basic raw materials that we purchase are made from materials that are on the (GRAS LIST), we cite that the ink is acceptable for direct food contact as outlined in Subchapter B of the code of federal regulations, sections 175.300, 176.170, and 176.180. The USDA goes along with this concept for meat and poultry products.

Unfortunately, most of the pigments that are used to manufacture printing inks are not on the Gras list. This does not mean that the inks can not be used for packaging food and meat products. The FDA and USDA now accept the "functional barrier" concept. This basically states that if the ink is protected or separated from the food by a carton, over-wrap, can or bag, then it is ok to use the ink, however, it is the end users responsibility to run extraction test to assure that nothing will migrate into or on the food product.

The end product of your business is printing carry-out bags for groceries, produce, and non food products. All of the food products are packaged in a carton, can, overwrap or bag. The "functional barrier" concept applies to all product that you print in your plant.

Thank you for the opportunity to be of service to you and Vanguard Plastics, Inc. When we can be of further service, please do not hesitate to call at once.

" WE APPRECIATE YOUR BUSINESS "

Sincerely,
FLINT INK CORPORATION

Bill Martin, Jr.

Bill Martin, Jr.
Lab Manager

cc: Bill Busekrus
Chris Cooper
Billy Ragland



VANGUARD PLASTICS INC.

10600 Kahlmeyer
St. Louis, Missouri 6
Tel. 314 - 428-30

March 2, 1990

Metropolitan St. Louis Sewer District
Dept. of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Attn: Mr. Lee W. Powers - Industrial Waste Engineer

Dear Lee,

Per our phone conversation Thursday, I am enclosing Material Safety Data Sheets to cover the water based inks, amine and wash solution that we anticipate using. We intend to discharge small quantities of water diluted ink down the sanitary sewers during the process of cleaning up our printing stations for color changeovers.

In an attempt to simplify your process of review, I have not sent you MSDS information that is obviously redundant. The tabulated information below lists all inks and materials that we intend using, showing which formulations are similar in their content of toxins.

*DA-48735	POLY AQUA GLOSS WHITE	
**DA-48762	POLY AQUA GLOSS GREEN	
**DA-48891	POLY AQUA GLOSS ORANGE	
DA-48891	POLY AQUA GLOSS BLACK	(similar to DA-48735)
DA-49096	POLY AQUA GLOSS RED	(similar to DA-48783)
DA-49227	POLY AQUA GLOSS YELLOW	(similar to DA-48783)
DA-49228	POLY AQUA GLOSS CONVENIENCE YELLOW	(similar to DA-48783)
DA-49229	POLY AQUA GLOSS ORANGE	(similar to DA-48783)
DA-49230	POLY AQUA GLOSS BROWN	(similar to DA-48783)
DA-49231	POLY AQUA GLOSS ALMAC GREEN	(similar to DA-48735)
DA-49232	POLY AQUA GLOSS BUNZL GREEN	(similar to DA-48735)
DA-49233	POLY AQUA GLOSS BUNZL BLUE	(similar to DA-48735)
DA-49234	POLY AQUA GLOSS KROGER BLUE	(similar to DA-48735)
DA-49235	POLY AQUA GLOSS DARK BLUE	(similar to DA-48735)
DA-49236	POLY AQUA GLOSS LUND'S TURQUOISE	(similar to DA-48735)
DA-49375	POLY AQUA GLOSS MAROON	(similar to DA-48735)

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DA-49397 SPECIAL PLATE WASH
**DA-50078 POLY AQUA GLOSS FOOD LION BLUE
52-0002-06 PROPRIETARY AMINE

* All pages of MSDS enclosed
**First & last pages only MSDS enclosed

This list of inks is not meant to constitute all inks that we will be using in this plant because we are not yet fully into water based inks. However, I anticipate that any additions to these inks will not be significantly different in the OSHA toxins.

Please grant Vanguard Plastics approval to discharge small quantities of water containing these materials down the sanitary sewer. Should you have any questions, please feel free to call.

Sincerely,



Don Van Nortwick
Technical Manager

cc: Greg Smith



Metropolitan
St. Louis Sewer
District

Department of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710

March 6, 1990

Don Van Nortwick
Technical Manager
VAN GUARD PLASTICS, INC.
10600 Kahlmeyer Drive
St. Louis, MO 63132

Dear Mr. Nortwick:

We have reviewed the MSDS sheets submitted in conjunction with your request for approval to discharge small quantities of wash up water from your water based ink equipment.

Based on the information submitted we are granting our approval for this discharge to the sanitary sewer.

MSD reserves the right to revoke this discharge authorization at anytime if it is determined that the discharge is causing or contributing to any operational or maintenance problems.

If you have any questions, please call me at 436-8715.

Sincerely,

METROPOLITAN ST. LOUIS SEWER DISTRICT

Lee W. Powers

Lee W. Powers
Industrial Waste Engineer

jsf